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REMARKS

Claims 1-30 are pending in the application.

Claims 1-30 are rejected.

Claims 1, 12 and 21 are amended herein.

35 USC 103(a)

All pending claims in the application have been rejected under 35 USC §103(a) as being obvious in view of Havinis et al. (US 2003/0202521) or else as being obvious in view of Havinis and further in view of admitted prior art.

Applicants submit that the claims of the present invention are allowable over the prior art since the cited art fails to disclose all of the limitations of the claims as they stand.

With regard to Claims 1, 12 and 21, the cited art does not disclose a unified location management device that, for an internet telephony call to a mobile user, selects a gateway based on the information provided from the unified location management device, as is claimed. Moreover, the cited reference does not disclose a unified location management device that acts as an inbound proxy for a given IP domain in the case of an internet telephony call to a mobile user, as is claimed.

The Havinis reference does not teach or suggest optimizing a call initiated from the IP domain. This is because the location manager of Havinis is in the PLMN domain and built for PLMN networks. Thus, any call from an IP domain must go through PLMN after a gateway is selected without using the location information. This is in contrast to the presently claimed invention that utilizes a unified location management device that obtains location information before gateway selection, thereby allowing optimized gateway selection.

More specifically, the HLR of Havinis does not have unified location management as is set forth in the presently claimed invention. Havinis only

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contains the location information of the mobile in PLMN domain (not in IP domain).

In addition, the Office Action states that 'Havinis discloses selecting a gateway based on the location information'. The Office Action is wrong on this point. No such disclosure of selecting a gateway based on location information is present in the reference; all that is disclosed in the referenced section is that the Havinis solution will select a GW which has the capability to support a given media. And actually, no location information is sent back on such response.

Furthermore, a MG (media gateway) usually belongs to a single MGC (media gateway controller) in the current technology; so at the time when a MGC is selected, the set of available MGs is then chosen - this is before a unified location manager is contacted. Accordingly, there is then no way to use the location information to select the optimum MG as is claimed.

The solution of the claimed invention directly talks to a unified location manager before the MGC is contacted. The unified location manager lies between the IP domain and PMLN domain and not just in PMLN domain as does Havinis.

Based on the above remarks, the independent claims of the present invention are believed to be allowable.

With regard to Claims 2-3, 13-14 and 22-23, as discussed above, the approach of the Havinis reference does not have location information when a gateway is selected. Thus, there is no way to optimize the gateway selection as is claimed by the present invention. Accordingly, the above claims are also believed to be allowable on that basis.

With regard to Claims 4, 9, 15, 19, 24, and 28, the cited reference uses a temporary telephone number to extend the call leg from GMSC to MSC. In

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contrast, the present invention sends this information back to IP domain, and uses it to select the GW based on location as claimed.

With regard to Claims 5, 16, 25, again the Havinis solution uses a PMLN location manager, not unified location manager as claimed.

Regarding Claims 6, 17 and 26, the solution of the cited art doesn't deliver the mobile location information to IP domain. The information is just referred after an IP telephony call is translated into PLMN call.

Based on the above remarks and the amendments to the claims, applicants submit that the claims have been shown to be allowable in view of the prior art and that the basis for any rejections has been overcome.

Conclusion

In view of the foregoing, allowance of all the claims presently in the application is respectfully requested, as is passage to issuance of the application. If the Examiner should feel that the application is not yet in a condition for allowance and that a telephone interview would be useful, he is invited to contact Applicants' undersigned attorney at
908 582-7584.

Respectfully submitted,

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Lucent Technologies Inc.

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